

~~United States District~~  
United States District  
Court  
of TEXAS

United States of America

v.

Thomas Selgas  
Michelle Selgas  
John Green

Case 3:18 -

CR-00356-S

Supplement to BOND  
Motion

DEPUTY CLERK



2018 OCT 31 AM 9:17

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

Comes now John Green (Defendant Green) through his counsel of record, Michael Minus, who would add one request to his current motion. He requests the right to have a weapon in his home which in the winter is surrounded by dangerous animals.

The second amendment guarantees him such right.

His family which includes a 17 year old daughter, his wife, his 90 year old mother-in-law, and his cousin a disabled priest is also without adequate defense because the household cannot currently house a weapon.

Green is presumed innocent and on bond but even if convicted of a non-violent crime should have access to a weapon to defend himself.

Counsel only heard of case law affirming this position thirty minutes before the hearing on bond change.

The Government does not agree or disagree without opportunity to brief this issue. Counsel spoke briefly with opposing counsel who asked the motion be held until briefing and/or additional oral argument.

Counsel requests the earliest setting - winter danger in Idaho is approaching.

*Michael L. Minnis*  
Michael L. Minnis  
For Defendant Green

Service

I am handing a copy this A.M. to opposing counsel

*Michael L. Minnis*